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ATTORNEY FOR CROSS-DEFENDANT  
MICHAEL J. PLAKE

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF WYOMING**

HEALTHTECH MANAGEMENT )  
SERVICES, INC., )

Plaintiff, )

v. )

Case No. 11-CV-042-NDF

PAUL CARDWELL, )

Defendant. )

POWELL VALLEY HEALTH CARE )  
INC., a Wyoming nonprofit )  
Corporation )

Cross-Claimant, )

v. )

HEALTHTECH MANAGEMENT )  
SERVICES, INC.; PAUL CARDWELL )  
AND MICHAEL J. PLAKE )

Cross- Defendants )

HEALTHTECH MANAGEMENT	)
SERVICES, INC.,	)
	)
v.	)
	)
MICHAEL J. PLAKE,	)
	)
Cross-Defendant	)

ANSWER TO CROSS-CLAIMS AND ASSERTION OF FIFTH  
AMENDMENT

COMES NOW, cross defendant Michael J. Plake, by and through undersigned counsel generally denies all allegations in the Cross-Claims by Powell Valley Health Care, Inc. and Healthtech Management Services, Inc, pursuant to Rule 8 of the Federal Rules of Civil Procedures with respect to both Cross-Complaints.

FURTHER, cross-defendant, Michael J. Plake, has been charged in a separate criminal indictment, 12-CR-00081-NDF, and consequently, by and through undersigned counsel, asserts his privilege against self-incrimination under the Fifth Amendment to the United States Constitution.

Respectfully submitted this 29<sup>th</sup> day of May 2012, by

/s/ Michael Reese

Michael Reese

On Behalf of Cross-Defendant Michael J. Plake

#### CERTIFICATE OF SERVICE

The undersigned certifies that on the 29<sup>th</sup> day of May, 2012, the foregoing document was electronically filed and served upon counsel of record via CM/ECF or the Court's Electronic Filing System.

/s/ Michael Reese

Michael Reese

On behalf of Cross-Defendant Michael J. Plake